

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i>))
))
))
Plaintiffs,)	No. 1:14-cv-254
)	
v.)	
)	
UNITED STATES OF AMERICA, <i>et al.</i>))
)	
Defendants.)	
)	

UNOPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDER

As explained in the Joint Status Report of July 31, 2015 (ECF No. 285), counsel for Plaintiffs have requested personally-identifiable information regarding certain individuals maintained by U.S. Citizenship and Immigration Services (USCIS), a federal agency within the Department of Homeland Security (DHS). In order to permit the disclosure of the information Plaintiffs have requested, and to protect the privacy concerns of non-party individuals, the parties have agreed to a Stipulated Protective Order, which is attached to this motion. Defendants respectfully request that the Court enter this Order, and Plaintiffs have indicated that they do not oppose this motion.

Date: August 13, 2015

KENNETH MAGIDSON
United States Attorney

DANIEL DAVID HU
Assistant United States Attorney
Deputy Chief, Civil Division

Respectfully submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

JOYCE R. BRANDA
Deputy Assistant Attorney General

AUGUST E. FLENTJE
Special Counsel

JAMES J. GILLIGAN
Special Litigation Counsel

/s/ Jennifer D. Ricketts
JENNIFER D. RICKETTS
Director, Federal Programs Branch
Attorney-in-Charge (VA Bar No. 29281)
DANIEL SCHWEI
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
P.O. Box 883
Washington, D.C. 20044
Tel.: (202) 514-3671
Fax: (202) 616-8187
Jennifer.D.Ricketts@usdoj.gov

Counsel for Defendants

CERTIFICATE OF CONFERRAL

Pursuant to Local Civil Rule 7.1D, undersigned counsel hereby certifies that counsel for Plaintiffs, Angela Colmenero, was contacted regarding Plaintiffs' position on the foregoing Unopposed Motion for Entry of Protective Order, and indicated that Plaintiffs do not object to the relief sought in this Motion.

/s/ Jennifer D. Ricketts
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Unopposed Motion for Entry of Protective Order has been delivered electronically on August 13, 2015, to counsel of record via the District's ECF system.

/s/ Jennifer D. Ricketts
Counsel for Defendants